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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of	)	
themselves and all others similarly situated,	)	
	)	Case No. 6:21-cv-00474-AA
Plaintiffs,	)	
v.	)	<b>DECLARATION OF TARAN</b>
	)	<b>TRINNAMAN IN SUPPORT OF</b>
U.S. DEPARTMENT OF EDUCATION and	)	<b>MOTION TO AMEND</b>
Suzanne GOLDBERG, in her official capacity as	)	<b>MOTION FOR</b>
Acting Assistant Secretary for Civil Rights,	)	<b>TRO/PRELIMINARY</b>
U.S. Department of Education,	)	<b>INJUNCTION</b>
	)	
Defendants.	)	

I, Taran Trinnaman, declare:

1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. I attended Brigham Young University-Provo from 2013 – 2019.
3. I'm a Queer Black man who experienced both anti-LGBTQ discrimination and racism.
4. I couldn't date the entire time of my tenure at BYU otherwise I could have been kicked out.

5. While my roommates brought dates to our apartment, I couldn't do the same thing because my roommates would've turned me into the school's honor code office where I could've on top of losing all progress of my education, I could also lose my housing.
6. Speaking of housing, all housing for Brigham Young University bans "same-sex relationships" yet does nothing while I had roommates who made derogatory racial remarks towards my ethnic background and other protected ethnic groups. And I witnessed several friends actually be threatened by members of our student body online yet the school did nothing to address it.
7. In 2019, for my Anthropology of Mormonism class, I conducted research on contextualizing the history of LGBTQ+ discrimination within Mormonism in the United States. That research paper led to the worst depressive episodes I'd ever experienced.
8. I felt gutted to the extreme when I realized how violent this community was and is to the LGBTQ+ community. It gutted my mental health.
9. I got a great grade, but I knew I was not safe. I learned LGBTQ+ students bled and died where I walked, and I couldn't do it anymore, and I left Provo to do an internship. BYU has still never apologized for their homophobia or responsibility for the suicides and trauma of LGBTQ+ students on campus.
10. Also, around 2019, during an uproar in a White Christian nationalistic movement around Provo, I had several queer friends at BYU received death threats.
11. In 2020, the university removed a clause in the "Honor Code" banning homosexual behavior. Then, students came out. And two weeks later, an email was sent to all the students clarifying the university's position had not changed. If queer students were caught, they would be met with disciplinary action.
12. The following year in May of 2021, a professor from BYU called a student a "Korihor", a religious and invidious hate slur, on Twitter and led to several members of that White Christian nationalistic movement to go after said student. BYU never condemned these acts. See Exhibit A.
13. I have long since realized I was not safe at BYU. That same day of the "Honor Code" clarification, I made a request to transfer for my own safety. I lost many credits and had to retake classes. I had to have friends help fundraise so that I could afford to transfer because it was expensive.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 24th day of August, 2021.

By: s/ Taran Trinnaman  
Taran Trinnaman